

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: LOCAL TV ADVERTISING
ANTITRUST LITIGATION

Case No. 1:18-CV-06785
MDL No. 2867

Hon. Virginia M. Kendall

**JOINT STIPULATION TO EXTEND TIME TO FILE MOTION TO COMPEL
DISCOVERY FROM PUTATIVE CLASS MEMBERS**

Plaintiffs Thoughtworx, Inc. d/b/a MCM Services Group (“Thoughtworx”), One Source Heating & Cooling, LLC (“One Source”), Hunt Adkins, Inc. (“Hunt Adkins”), and Fish Furniture (collectively, “Plaintiffs”), and Defendants Dreamcatcher Broadcasting, LLC, The E.W. Scripps Company, Gray Media Group, Inc. (formerly known as Raycom Media, Inc.), Griffin Communications, LLC, Meredith Corporation, Nexstar Media Group, Inc., Sinclair Broadcast Group, Inc., TEGNA, Inc., Tribune Broadcasting Company, LLC, and Tribune Media Company (collectively, “Defendants”) submit this joint stipulation to extend Defendants’ deadline to file a motion to compel putative class members Clay, Massey & Associates, P.C.; Dozier Law Firm LLC; Gibbons Ford, LP; LM SAC, LLC d/b/a Jaguar Little Rock, Land Rover Little Rock and Owens Murphy Jaguar Land Rover VW; and Northtown Automotive Companies, Inc. to produce documents responsive to Defendants’ revised subpoena requests, stating as follows:

1. In late August and early September 2021, Defendants served document subpoenas (“Subpoenas”) on 20 companies that had previously filed their own individual lawsuits against

Defendants that have been consolidated in this multidistrict litigation, and that are members of the putative class that Plaintiffs seek to represent.

2. On January 28, 2022, Plaintiffs filed a Motion to Quash and/or For Protective Order Regarding Subpoenas Issued to Absent Class Members. ECF No. 523.

3. On July 5, 2022, the Court entered an Order Granting Plaintiffs' Motion to Quash, but stated therein, "If Defendants can live with obtaining information from fewer than all 20 Subpoenaed Plaintiffs . . . and they significantly narrow the information they are seeking from a smaller subset of subpoenaed Plaintiffs, or a subpoenaed Plaintiff agrees to produce a narrower or more tailored set of documents, nothing in this Order is intended to foreclose those discussions or agreements along those lines." ECF No. 634 at 4.

4. On July 13, 2022, Defendants revised their subpoena document requests and pursued responses from five of the original twenty putative class members: Clay, Massey & Associates, P.C.; Dozier Law Firm LLC; Gibbons Ford, LP; LM SAC, LLC d/b/a Jaguar Little Rock, Land Rover Little Rock and Owens Murphy Jaguar Land Rover VW; and Northtown Automotive Companies, Inc.

5. On August 18, 2022, the parties met and conferred about Defendants' revised Subpoena requests to the five putative class members. Plaintiffs objected to responding to Defendants' revised Subpoena requests on a number of grounds, including to the extent they seek (1) information about or related to advertising other than broadcast TV spot advertising; and (2) information about or related to advertising purchases made through advertising agencies. Both of these objections are already the subject of Defendants' pending Motion to Compel, ECF No. 652. The Court's ruling on the pending Motion may resolve or inform some of the parties' disputes as to Defendants' revised Subpoena requests.

6. The current deadline for filing motions to compel without a showing of good cause is September 1, 2022. ECF No. 510.

7. Counsel for Plaintiffs and counsel for Defendants have conferred and agreed to extend Defendants' deadline to file a motion to compel as to the Subpoena requests to 30 days after the Court issues an Order resolving Defendants' Motion to Compel, ECF No. 652.

8. No party will be prejudiced by an order granting the requested relief, and the interests of justice favor the entry of such order.

WHEREFORE, Plaintiffs and Defendants respectfully request that the Court enter an order extending Defendants' deadline to file a motion to compel as to the Subpoena requests to 30 days after the Court issues an Order resolving Defendants' Motion to Compel, ECF No. 652.

Dated: September 1, 2022

Respectfully submitted,

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IT IS SO ORDERED.

Dated: _____, 2022

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